

(Rev. 4/97)

ORIGINAL

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983UNITED STATES DISTRICT COURT
DISTRICT OF DELAWAREJERON D. BROWN

(Enter above the full name of the plaintiff in this action)

v.

MR. THOMAS D. DONOVAN ESQ424 S. STATES STREETDOVER, DE. 19901

(Enter above the full name of the defendant(s) in this action)

FILED

APR 29 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

05-254

I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal courts dealing with the same facts involved in this action or otherwise relating to your imprisonment?

YES []

NO ~~[X]~~

- B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs

Defendants

N/A

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2. Court (if federal court, name the district; if state court, name the county)

3. Docket number

4. Name of judge to whom case was assigned

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit

7. Approximate date of disposition

II. A. Is there a prisoner grievance procedure in this institution? Yes ☐ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ☐ No ☒

C. If your answer is YES,

1. What steps did you take?

2. What was the result?

D. If your answer is NO, explain why not

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes ☐ No ☒

F. If your answer is YES,

1. What steps did you take?

2. What was the result?

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff JERON D. BROWN

Address D.C.C. 1181 Paddock Road Smyrna, Del. 19977

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and place of employment of any additional defendants.)

B. Defendant MR. THOMAS D. DONOVAN is employed as ATTORNEY
AT LAW at 424 S. STATES STREET DOWEL, DE. 19901

C. Additional Defendants _____

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

INEFFECTIVE ASSISTANCE OF COUNSEL, gross Negligence,
UNPROFESSIONAL CONDUCT, CONFLICT OF INTEREST, DENIAL
OF Compulsory Process, DEPRIVATION OF LIFE AND LIBERTY,
DENIAL OF ADVERSAL PRESENTATION, INTENTIONAL INFLICTION
OF MENTAL AND EMOTIONAL DISTRESS, BIAS, prejudice
AND LEGAL MALPRACTICE AT PRETRIAL STAGES AND DURING
TRIAL.

STATEMENT OF CLAIMS

MR. DONOVAN'S FAILURE'S AND OMISSIONS ARE GROSSLY NEGLIGENT AND HAVE CAUSED PLAINTIFF TO SUFFER MENTAL INJURY, EMOTIONAL ANGUISH AND DEPRIVATION OF HIS LIBERTY WITHOUT DUE PROCESS BY MR. DONOVAN'S RECKLESSNESS AND CARELESSNESS ACTIONS IN FAILING TO ABIDE BY THE RULES AND CODES OF PROFESSIONAL CONDUCT AND THE CIVIL RIGHTS ACT.

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.)

DAMAGES FOR THE DEPRIVATION OF COMPETENT COUNSEL,
THAT RESULTED ON AN UNFAIR TRIAL WHICH
DEPRIVED PLAINTIFF OF HIS LIFE AND LIBERTY
WITHOUT DUE PROCESS, COMPENSATORY DAMAGES, INJUNCTIVE,
PUNITIVE, MENTAL AND EMOTIONAL INJURY AND DECLARATORY RELIEF,
\$1 MILLION ON EACH CLAIM

Signed this 18th day of April, 2005.

Jerome D. Brown
 (Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

4-18-05
 Date

Jerome D. Brown
 (Signature of Plaintiff)

1/M Jerri D. Brown
SBI# 62962 UNIT B
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



TO THE CLERK OF
THE UNITED STATES DISTRICT COURT

OF DELAWARE

U.S.M.S.
X-RAY

844 N. King Street

Lock Box 18

Wilm, Del. 19801

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